

EXHIBIT B

From: [Andrew H. DeNinno](#)
To: [Ronald Chapman Sr.](#)
Subject: RE: Allstate v. SE MI Hospital, et al.
Date: Tuesday, May 28, 2024 8:45:00 PM
Attachments: [image001.png](#)

Good evening Ron -

While I remain hopeful that we are going to reach a resolution in the near future, my client insists that that it pursue the discovery sought by the requests served in November. I remain available to conclude our conference about the responses to that discovery tomorrow, May 29, and am now available all day after a deposition was adjourned. I am also available on Thursday, May 30, in the morning. Please let me know what time works for you. To the extent we have unresolved discovery issues, Allstate needs to file its motion to compel this week.

Thank you,
Andrew

From: Andrew H. DeNinno
Sent: Thursday, May 23, 2024 8:50 AM
To: Ronald Chapman Sr. <rchapman@chapmanlawgroup.com>
Subject: Allstate v. SE MI Hospital, et al.

Good morning Ron –

While I am hopeful that we can continue our settlement discussions, which recently seem to have been productive, my client has directed me to move forward with obtaining discovery. I would like to conclude our Rule 7.1 conference before filing a motion to compel to hopefully narrow the issues. Can you please let me know when you are available? I can do anytime tomorrow, anytime after 10:00 a.m. on Tuesday of next week (May 28), or any time before 1 p.m. on Wednesday of next week (May 29).

I would also like to discuss dates for depositions during the call. Thankfully, we are down to just one attorney on each side, so it should be easier to find dates than when we last attempted this process, but we do need to get some dates on the calendar.

Thank you,
Andrew

Andrew H. DeNinno
Shareholder
EMAIL adeninno@ktmpc.com



350 Granite Street, Suite 2204, Braintree, MA 02184

TEL 617.770.2214 **CELL** 781.664.4146 **FAX** 617.774.1714

ktmpc.com